

We Energies Comment to be filed with the FCC re ITA's Petition to Coordinate Power, railroad, and Automobile Emergency Frequencies in the VHF and UHF Land Mobile Bands (RM-10687)

Wisconsin Electric Power Company/Wisconsin Gas Company ("We Energies") is filing this comment in opposition to the ITA Petition to Coordinate Power, railroad, and Automobile Emergency Frequencies in the VHF and UHF Land Mobile Bands (RM-10687). We Energies strongly supports UTC's retention of its limited ability to protect our utility's mission-critical communications systems from congestion and interference as Commission rules allow.

We Energies' position is that ITA lacks the general knowledge of the critical utility business functions to effectively represent its utility member interests. We Energies' business functions include control of critical infrastructure (CI) systems including power plant operation, gas and electric delivery, hydro dam operations, security surveillance, and other vital functions necessary to maintain safe, reliable, and efficient energy delivery. Highly available and robust fixed wireless communications are absolutely essential to continue to support these systems.

We Energies maintains that ITA's proposal, if adopted, would result in reduced protection for the Power Radio channels in which We Energies is currently licensed. This has been clearly demonstrated by ITA's openly adverse position to utilities in the 800 MHz public safety interference docket and other proceedings.

Finally, We Energies believes that while competitive frequency coordination is generally preferred, these channels were exempted from the rules on competitive coordination specifically so that licensees on these channels would be assured of greater protection from interference. Governmental regulatory bodies have long recognized exemptions for utilities, public service agencies, state and US governmental bodies, telecommunications providers, and radio amateurs as they clearly understood the public service and safety responsibilities of these groups. Continuance of this philosophy assures that the interests of public safety are protected.